CORRES. CONTROL
OUTGOING LTR NO.

93 RF 3667

DIST.	LTR	ENC
BENEDETTI, R.L.		
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
DAVIS, J.G.		
ERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAHL, T.		
HILBIG, J.G.		
HOEKER, E.H.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.	X	X
MANN, H.P.		
MARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
RIZZUTO, V.M.		
RILEY, J.H.		
SANDLIN, N.B.		
SHEPLER, R.L.		
STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILLIAMS, S. (ORC)		
WILSON, J. M.		
WANE, J. O.		
MALIN, J	x	x
LONDON, K	x	x
CORRES CONTROL	x	x
TRAFFIC		

CLASSIFICATION:

UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS
☐ OPEN ☐ CLOSED
☐ PARTIAL
LTR APPROVALS:

ORIG & TYPIST INITIALS

RF-46469 (Rev. 9/92)

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March 30, 1993 93-RF-3667

Frazer R. Lockhart
Environmental Restoration Division
DOE, RFO

DOCUMENTATION OF DISCUSSIONS WITH REGULATORS - EML-185-93

Attached please find the written documentation of our discussions of Solar Ponds options with the regulators. Transmittal of this information to the regulators will satisfy our promise to them for written documentation. They have promised us a written reply stating their position on our revised approach.

If you have any questions, please contact me on 966-8648.

E. M. Lee

E. M. Lee
Program Manager
Solar Ponds Remediation

apt

Orig. & 1 cc - F. R. Lockhart

Attachments:
As Stated

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

March 30, 1993

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

DOCUMENTATION OF THE MARCH 17, 1993 MEETING

Attached please find the a summary of the information discussed at our recent meeting.

Please feel free to contact me on 966-4538 if you require additional information.

Frazer R. Lockhart
Environmental Restoration Division
Department of Energy - Rocky Flats Office

SOLAR PONDS OPTIONS

As we have discussed with your representatives at various meetings over the past several months, uncertainty over the availability of the planned disposal site in Nevada, coupled with the cost of storing processed sludge, the risk of a change in waste acceptance criteria, and high cost projections for the total program have led us to re-evaluate our current approach for cleaning out and stabilizing the liquids and sludges present in the Solar Pond Complex at the Rocky Flats Plant.

We postulated various alternative waste stream storage, processing, and disposal approaches and analyzed them with respect to technical feasibility, completion dates regarding regulatory drivers, total program cost, and flexibility to determine the most viable approach for accomplishing objectives of the Solar Pond Remediation Program. All approaches had a common objective of eliminating the pond sludge as a potential source of contaminants to the ground underneath the ponds and to adjacent ground water.

Based on our analysis, we have concluded that our current approach (cementation of the C pond sludge in FY94, the B pond sludge in FY95, and the currently stored/failing pondcrete and saltcrete after a disposal site opens) is less prudent than several other approaches. It would preclude pursuit of less costly approaches, has a high cost for treating a relatively low hazard material, and has scheduling and reprocessing risks associated with the availability of the repository. We also concluded that removing the sludge from the ponds and temporarily storing it in an untreated form is no quicker at eliminating the pond sludge as a potential source of contaminants than relining ponds for safe storage of pond contents. Removing the sludge and

temporarily storing it also has increased risks associated with above ground storage, and merely defers (and increases) the ultimate treatment and disposal costs. Finally, we concluded that consolidating the sludge as much as feasible and temporarily storing it would adequately minimize or eliminate the potential for environmental contamination as soon as other options while preserving the possibility of pursuing potentially more attractive alternatives for final disposition of the wastes.

We have, therefore, formulated a revised approach which has the following major features:

- Consolidate the contents of B ponds North and B Center into B South -- the pond with the newest and presumably best liner.

- As B North and Center become empty, assess the integrity of their liners and sample the area under them to determine the likelihood that the liners and underlying soil will have to be removed as part of the final closure.

- Depending on the results of the sampling, re-line B North and B Center to RCRA standards (after analysis confirms that these are the most appropriate ponds to use for temporary, RCRA compliant storage).

- Transfer the original contents of C Pond and the clarifier to B North.

- Transfer the contents of B South to B Center.

- Pursue a treatability study on the existing, stored pondcrete and saltcrete to be prepared to accelerate the schedule for processing (current plan is cementation) and off-site disposal if a site becomes available sooner than anticipated.

- Pursue development of a new IM/IRA as the permitting vehicle for handling the sludge near-term, temporarily (for example, by storing the sludges in existing or re-lined ponds or some other less costly variation as indicated by analysis).

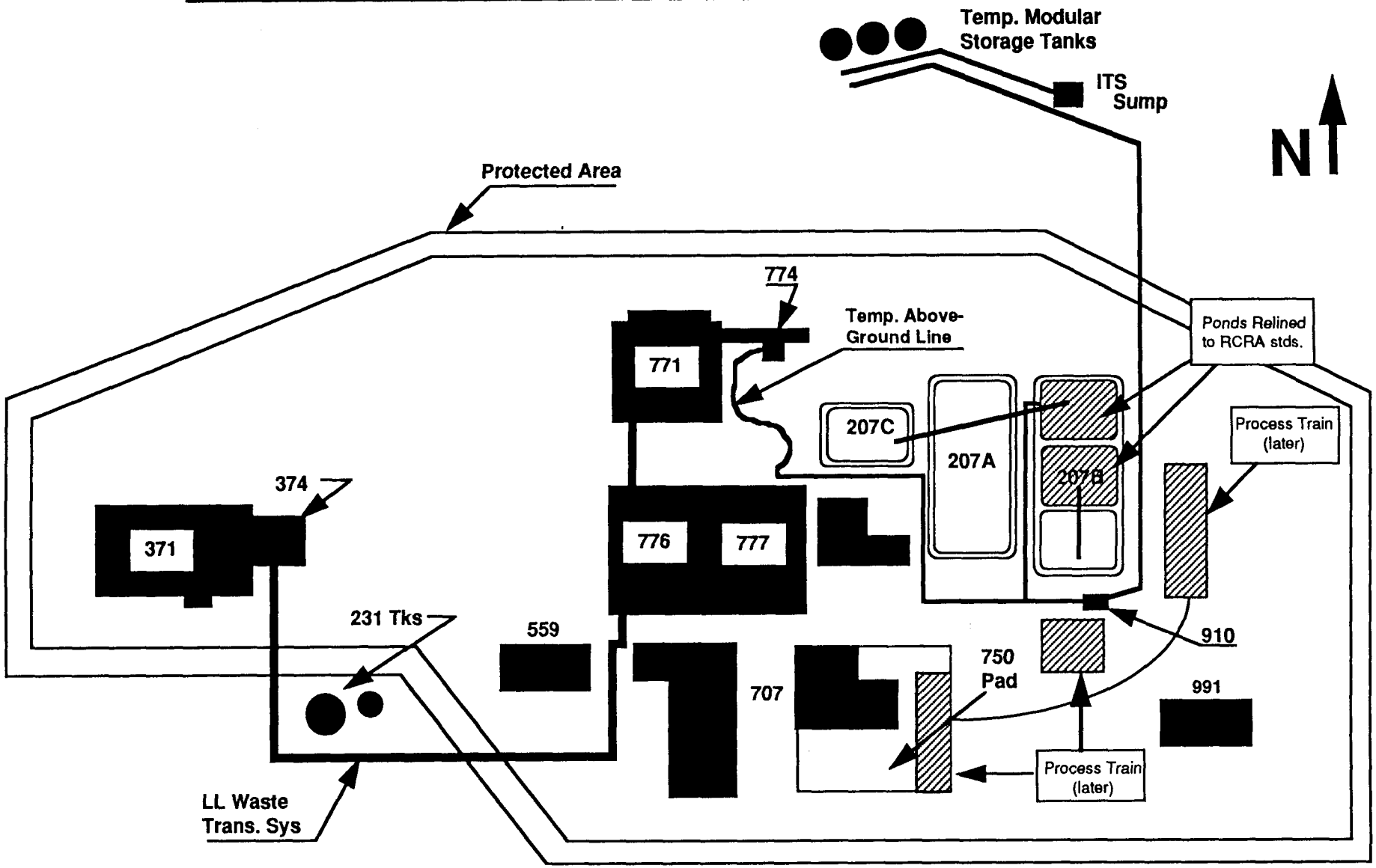
- Continue the current actions underway: divert the placement of ITS water from the ponds to the surge tanks; transfer pond water (and ITS water as capacity allows) to Building 910 (when it starts up); and remove excess water from the ponds by pumping it to Building 374 for treatment (and ITS water as capacity allows) (see site plan, attachment I).

Attachment 2 depicts the decision logic of our path forward. We plan to implement a new IM/IRA towards the end of this year. This time frame affords us an opportunity to collect and analyze data from underneath and around the ponds in order to form the basis for a decision on whether the existing pond linings must be removed and on re-lining the ponds. Therefore, we are seeking your early and active participation in the decision making process. We realize the high level of interest in the Solar Ponds Remediation Program and appreciate the time you and your staff are devoting to frequent meetings and discussions with us in an attempt to mutually seek an expeditious, prudent solution to the problem. In order to firm up our current plans and out year programming we would appreciate receiving by *March 31, 1993* your endorsement of the approach outlined above.

Attachment 1

Attachment II
93-RF-3667
Page 1 of 1

SCHEMATIC OF REVISED PLAN



Attachment 2

Attachment III
93-RF-3667
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SIMPLIFIED DECISION TREE FOR PATH FORWARD